



Brian Bardwell <brian.bardwell@gmail.com>

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## Williamson v. Lorain County, et al. - Defendants' Discovery Responses

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**Stephen Bosak** <sbosak@dooleygembala.com>

Tue, Jun 4, 2024 at 9:16 AM

To: Brian Bardwell <brian.bardwell@speech.law>

Cc: Matthew Dooley <mdooley@dooleygembala.com>, Michael Briach <mbriach@dooleygembala.com>, Amy Joyce <ajoyce@dooleygembala.com>

Brian:

We anticipate getting the written responses to you by tomorrow. As you note, if supplemental responses become necessary, we will supplement accordingly. Given the sheer number of Plaintiff's requests, we still appreciate the patience.

Thanks,

Stephen

Stephen M. Bosak | DGMP | 440.930.4001

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**From:** Brian Bardwell <brian.bardwell@speech.law>

**Sent:** Monday, June 3, 2024 4:48 PM

**To:** Stephen Bosak <sbosak@dooleygembala.com>

**Cc:** Matthew Dooley <mdooley@dooleygembala.com>; Michael Briach <mbriach@dooleygembala.com>; Amy Joyce <ajoyce@dooleygembala.com>

**Subject:** Re: Williamson v. Lorain County, et al. - Defendants' Discovery Responses

Hi, Stephen.

Given Defendants' attempt to grant themselves an open-ended extension on discovery with only an aspirational deadline for compliance, we are disappointed that our request for at least their written responses is being ignored.

Please send them along. We understand that providing them timely may mean that you need to supplement them later on.

Please also see our filings from today, which are at



Brian D. Bardwell

Speech Law LLC

1265 West Sixth Street, Suite 400

Cleveland, OH 44113-1326

216-912-2195

[brian.bardwell@speech.law](mailto:brian.bardwell@speech.law)

[www.speech.law](http://www.speech.law)

On Thu, May 30, 2024 at 9:47 PM Brian Bardwell <[brian.bardwell@speech.law](mailto:brian.bardwell@speech.law)> wrote:

Hi, Stephen.

Please send the written responses in the meantime.

Thanks,

-- Brian

On Thu, May 30, 2024, 9:27 PM Stephen Bosak <[sbosak@dooleygembala.com](mailto:sbosak@dooleygembala.com)> wrote:

Brian:

We're still sifting through potential responsive documents, which is delaying our ability to respond, so we'll need some additional time. My expectation is that we have responses to you by early/middle of next week and will start a rolling production at that time to. I'll keep you updated on our progress.

Thanks,

Stephen

Stephen M. Bosak | DGMP | 440.930.4001

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**From:** Stephen Bosak

**Sent:** Wednesday, May 22, 2024 5:30 PM

**To:** Brian Bardwell <[brian.bardwell@speech.law](mailto:brian.bardwell@speech.law)>

**Cc:** Matthew Dooley <[mdooley@dooleygembala.com](mailto:mdooley@dooleygembala.com)>; Michael Briach <[mbriach@dooleygembala.com](mailto:mbriach@dooleygembala.com)>;

Amy Joyce <[ajoyce@dooleygembala.com](mailto:ajoyce@dooleygembala.com)>

**Subject:** Re: Williamson v. Lorain County, et al. - Defendants' Discovery Responses

No objection.

Stephen M. Bosak | DGMP | 440.930.4001

On May 22, 2024, at 10:59 AM, Brian Bardwell <[brian.bardwell@speech.law](mailto:brian.bardwell@speech.law)> wrote:

Hi, Stephen.

Our responses to the RFAs are attached, but we'll need some more time for the balance. Can we get a 14-day extension?

Thanks,

--Brian

Brian D. Bardwell

Speech Law LLC

[1265 West Sixth Street, Suite 400](#)

Cleveland, OH 44113-1326

216-912-2195

[brian.bardwell@speech.law](mailto:brian.bardwell@speech.law)

[www.speech.law](http://www.speech.law)

On Fri, May 17, 2024 at 10:23 AM Brian Bardwell <[brian.bardwell@speech.law](mailto:brian.bardwell@speech.law)> wrote:

Hi, Stephen. That's fine.

Brian D. Bardwell

Speech Law LLC

[1265 West Sixth Street, Suite 400](#)

Cleveland, OH 44113-1326

216-912-2195

[brian.bardwell@speech.law](mailto:brian.bardwell@speech.law)

[www.speech.law](http://www.speech.law)

On Thu, May 16, 2024 at 11:43 AM Stephen Bosak <[sbosak@dooleygembala.com](mailto:sbosak@dooleygembala.com)> wrote:

Brian:

Defendants need additional time to respond to Plaintiff's discovery requests. Any objection to a 14-day extension on our responses?

Thanks,

Stephen

Stephen M. Bosak | DGMP | 440.930.4001

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<2024-05-22 Williamson responses to Lorain County RFAs.pdf>